DEPARTMENT OF EDUCATION SPECIAL EDUCATION PROGRAMS

Rapid City School District Continuous Improvement Monitoring Process Report 2003-2004

Team Members: Chris Sargent, Barb Boltjes, Rita Pettigrew, Linda Shirley, Mary Borgman, Donna Huber, Steve Gilles, Education Specialists, Ann Larsen, Special Education Programs and Dave Halverson, Transition Liaison.

Dates of On Site Visit: March 1st through 4th, 2004

Date of Report: March 5th, 2004

This report contains the results of the steering committee's self-assessment and the validation of the self-assessment by the Special Education Programs. The report addresses six principles – General Supervision, Free Appropriate Public Education, Appropriate Evaluation, Procedural Safeguards, Individualized Education Program and Least Restrictive Environment. Each principle is rated based on the following scale:

Promising Practice The district/agency exceeds this requirement through the implementation of innovative,

high-quality programming and instructional practices.

Meets Requirements The district/agency consistently meets this requirement.

Needs Improvement The district/agency has met this requirement but has identified areas of weakness that left

unaddressed may result in non-compliance.

Out of Compliance The district/agency consistently does not meet this requirement.

Not applicable In a small number of cases, the standard may not be applicable for your district/agency. If

an item is not applicable, the steering committee should briefly explain why the item is

NA. Example – no private schools within the district boundaries.

Principle 1 – General Supervision

General supervision means the school district's administrative responsibilities to ensure federal and state regulations are implemented and a free appropriate public education is provided for each eligible child with a disability. The specific areas addressed in principle one are child find, referral procedures, children voluntarily enrolled by parents in private schools, students placed by the school district, improving results through performance goals and indicators (assessment, drop out, graduation), professional development, suspension and expulsion rates.

Steering Committee Self-Assessment Summary

Data sources used:

- Surveys
- Private school information
- Local education association flow through funds request information
- Information on home school students

- Comprehensive plan
- Comprehensive system of personnel development plan
- District annual needs assessment
- Teacher Assistance Team (TAT): referral vs. non referral information
- Personnel training
- Budget information
- Screening information

Promising practice

The steering committee concluded the district uses a tracking system at each school to monitor students participating in the Teacher Assistance Team (TAT) process and those going on for further evaluation. Learning Center general educators are currently available to work with at-risk students under a preventative model.

The district Building Level Teams (BLTs) analyzes test data to make decisions regarding curriculum, staff development and allocation of resources. Cross district teams have been developed to implement a system of collaboration among the elementary learning center staff (special educators, general educators and speech/language personnel). Dakota Step data is used to identify the focus students.

Training on the Para-professional assessment was provided for all paraprofessionals in the district.

Meets requirements

The steering committee concluded the district has provided training opportunities to district staff on the Rapid City Area Schools intranet. Staff may submit a staff development request for a substitute, registration fee, and/or travel expenses for any of the listed training opportunities. A parent newsletter is also available to the community on the district website.

Validation Results

Promising practice

Through interview and observation, the monitoring team agrees with all areas identified as promising practices for general supervision as concluded by the steering committee.

The TAT process is a formal procedure used within the Rapid City School District. The general education learning center personnel monitor this process. Any students having difficulty in their learning environment can be referred to the TAT. The team tries to zero in on any problems the student may be experiencing. The process tries to distinguish whether the student has an issue that needs remediation or if there is an actual disability that may require specialized services. The general education learning center teacher is familiar with the student's history in the event the student is referred. The teachers provide strategies to both students and classroom teachers. Special educators and general educators are working together in the learning centers to provide a continuum of service options to all students. Ten of the eighteen general education learning center personnel are dually certified with special education degrees.

BLTs have been implemented and use "horizontal" and "vertical teams". Vertical teams are made up of different grade level teachers and different teaching positions, including art, music, physical education and all special educators. The teams meet periodically to develop a plan to improve performance for those students with the lowest scores on the Dakota STEP. The BLTs give the teachers a chance to bring forward student work and use a teaming approach to evaluate individual teaching strategies and their efficiency as evidenced by the student work. The teams use and analyze student specific and grade level data from the Dakota STEP statewide assessment to make decisions for staff development, curriculum decisions and the use of resources. Special education personnel participate in all curriculum trainings

with general education teachers. This is designed to ensure special education personnel become familiar with the reading and math content standards. In addition, this will assist special education students in accessing the general curriculum.

Cross district teaming uses the same strategy, but is district-wide at the elementary level. The cross-district teams include Learning Center special educators, Learning Center general educators, district-wide mentally handicapped (MH) teachers at the elementary level, district-wide emotionally disturbed (ED) teachers at the elementary level and speech/language personnel from the elementary level. This mixing of personnel allows for ideas to spread across the district and to develop more teachers that are confident in their ability to move all students to "proficient".

The district has taken steps to ensure district paraprofessional staff meets the highly qualified staff requirement. Paraprofessionals that did not complete the first round of testing successfully were provided with tutoring sessions in the identified areas of need. Individual testing sessions have been offered and will continue to be offered until each person is successful. The district has funded all the tutoring/testing sessions, provided career enhancement hours and/or provided substitutes for the testing sessions during the work day.

Meets requirements

The monitoring team agrees with the areas identified as meeting the requirements for general supervision as concluded by the steering committee.

Out of compliance

24:05:24:01. Referral

Referral includes any written request which brings a student to the attention of a school district administrator (building principal, superintendent, or special education director) as a student who may be in need of special education. A referral made by a parent may be submitted verbally, but it must be documented by a district administrator.

Through interview and a review of student records, the monitoring team could not locate a documented referral for 26 students initially evaluated. Special education staff interviewed was not aware of a referral document used by the district. A document used by district psychologists included "referral" in its title. This form however was not used as a referral which brings a student to the attention of a school district administrator (building principal, superintendent, or special education director) as a student who may be in need of special education.

24:05:18:03. Procedures for identification of misclassified children.

Each public agency must maintain specific documentation as to the identification, evaluation, program, and placement of each child with disabilities.

24:05:18:05. Program reviews.

The division shall conduct program administrative reviews to determine whether students have been classified according to this article. If, as a result of these reviews, the division determines that Individuals with Disabilities Education Act, Part B funds have been made available to an eligible public agency as the result of a misclassified child, the division shall begin recovery procedures.

The monitoring team was unable to validate an IEP was in effect on December 3rd, 2002 for 55 students who were listed on the district's 2002 child count. Through interview, district staff indicated students were placed on the child count list as a result of a computer programming error.

Principle 2 – Free Appropriate Public Education

All eligible children with disabilities are entitled to a free appropriate public education in the least restrictive environment. The specific areas addressed in principle two are the provision of FAPE to children residing in group homes, foster homes, or institutions, making FAPE available when a child reaches his/her 3rd birthday and providing FAPE to eligible children with disabilities who have been suspended or expelled from school for more than 10 cumulative days.

Steering Committee Self-Assessment Summary

Data sources used:

- Table B staff information
- Table C suspension/expulsion
- Table E enrollment
- Table L complaints
- Table M hearings
- Table N monitoring
- Screening data
- Personnel development/staff surveys
- Needs assessment
- Comprehensive plan
- Process and procedure manual
- Parent surveys

Promising practice

The steering committee concluded areas of promising practice are the building wide behavior programs for effective schools and the improvement of academics, "Stop, Look and Think" and "Building Effective Schools Together" (BEST). The district has implemented the use of behavior strategists at the elementary and middle school level to assist building teams with strategies which provide alternatives to suspension and expulsion. A dean of students has been placed in two elementary schools in response to behavior needs.

The district has established an interim alternative educational setting (suspension/expulsion room) for students who need to be removed from the educational setting. For instances that involve serious offenses (drugs or weapons), the district has developed an interim alternative placement (Suspension/Expulsion) classroom. This placement option has allowed students to receive special education while accessing general education curriculum as a 45 day placement option.

Meets requirements

The steering committee concluded the district meets requirements regarding the provision of a free appropriate public education to all eligible children with disabilities. The district provides services to students in private schools as well as home school students. The district provides a wide range of service options for students from birth to age 21.

Needs improvement

The steering committee concluded they do not have data on students once they graduate. They could better examine/evaluate programs if data was available regarding the success of students in post secondary programs or in jobs and living independently.

Validation Results

Promising practice

Through interview and observation, the monitoring team agrees with all areas identified as promising practices for free appropriate public education as concluded by the steering committee.

General Beadle Elementary and Horace Mann Elementary hired a Dean of Students to implement a building wide behavior plan for an effective school and to improve academics. General Beadle uses "Stop, Look and Think" and Horace Mann uses "Building Effective Schools Together" (BEST). During the first semester of the 2002-2003 school years, there were 225 behavior occurrences. The Dean of Students was hired for the second semester and the occurrences dropped to 82. The first semester of this current school year the occurrences have dropped again to 57.

The Stop and Think Program is a social skills program where students learn to stop and take a look at what is going on in the situation. They are taught to examine their situation and act accordingly. The upper levels work on impulse control. If there is an aggressive behavior the student is sent immediately to the Dean of Students.

Behavior strategists are located in six elementary schools and one middle school in the district. They have a set schedule and are in the buildings on a regular basis. They work with students on individual education programs (IEPs) and general education students. The behavior strategists develop behavior plans for students, work on affective skills, social skills, stress management and social stories. The strategists observe and evaluate students, they work with the TAT process, and they provide trainings to classroom teachers. They provide direct services to students as well as assistance to teachers. They have developed good building relationships and are a valuable resource.

The goal of the district is to identify problems early and provide interventions before a student makes inappropriate choices. There has rarely been an out of school suspension exceeding ten days. The district implements a tiered system for responding to behavior issues through suspension. The first response would be an in-school suspension classroom with a certified teacher. The next tier would be the 9th grade academy. The 9th grade academy is an alternative setting in which special education and general education work together to provide services. The IEP team meets for students with disabilities to assure that the students are provided services.

Meets requirements

The monitoring team agrees with the areas identified as meeting requirements for free appropriate public education as concluded by the steering committee.

Needs improvement

Through interview, district staff indicated they would like to better address transition services to students to ensure the end result is an outcome oriented process. Post school data would benefit the evaluation process.

Principle 3 – Appropriate Evaluation

A comprehensive evaluation is conducted by a team of knowledgeable staff, which also includes parental input. A valid and reliable evaluation will result in effective individualized education programs for eligible students. The specific areas addressed in principle three are written notice and consent for evaluation, evaluation procedures and instruments, eligibility determination, reevaluation and continuing eligibility.

Steering Committee Self-Assessment Summary

Data sources used:

- Surveys (parents, students, staff)
- Comprehensive plan
- RCAS process and procedure manual
- Tracking data for evaluations completed but not eligible
- List of tests currently used
- Student file review tabulation
- List of sign language Interpreters used in district (2002-03)
- List of languages represented in district, including sign language and braille

Promising practice

The steering committee concluded the quarterly newsletters from district program specialists provide information regarding functional assessment and reinforce/remind special education staff to use functional assessment in all evaluations.

Meets requirements

The steering committee concluded the district uses a variety of the most current assessments to evaluate children with disabilities and eligibility determination for students with disabilities meets requirements.

Needs improvement

The steering committee concluded all tests listed on the prior notice/consent for evaluation need to be administered consistently, especially functional assessment. Documentation of transition and functional assessment during the 25-day evaluation period needs to be included in all multidisciplinary assessment team (MDAT) reports. Parent input into the evaluation planning process needs to be consistently documented

Validation Results

Promising practice

Through interview and a review of student records the monitoring team could not validate the quarterly newsletter as a promising practice as concluded by the steering committee.

Meets requirements

The monitoring team agrees the district uses a variety of assessments to evaluate students with disabilities. District eligibility determination is not validated by the team as an area that meets requirements.

Needs improvement

Through interview and a review of student records, the monitoring team agrees parent input into the evaluation process need to be consistently documented. Documentation of parent involvement was found in the majority of records reviewed. As students are reevaluated, all records will contain required documentation.

Out of compliance

Issues requiring immediate attention

24:05:25:04. Evaluation procedures.

The school districts shall ensure the child is assessed in all areas related to the suspected disability, including, as applicable, health, vision, hearing, social and emotional status, general intelligence, academic performance, communicative status, and motor abilities.

24:05:24.01:01. Students with disabilities defined.

Students with disabilities are students evaluated in accordance with chapter 24:05:25 as having autism, deaf-blindness, deafness, hearing impairment, mental retardation, multiple disabilities, orthopedic

impairment, other health impairments, emotional disturbance, specific learning disabilities, speech or language impairments, traumatic brain injury, or visual impairments including blindness, which adversely affects educational performance, and who, because of those disabilities, need special education or special education and related services.

24:05:22:03. Certified child.

A certified child is a child in need of special education or special education and related services who has received a multidisciplinary evaluation and has an individual education program formulated and approved by a local placement committee. Documentation supporting a child's disabling condition as defined by Part B of the Individuals with Disabilities Education Act must be maintained by the school district for verification of its annual federal child count.

The review team identified the following issues:

- 1. A multidisciplinary team evaluation did not yield eligibility scores for a student so the team initiated an override in the areas of reading, writing and math. The students program did not contain a goal in reading, writing, math or any other academic area.
- 2. The standard error of measurement was used to determine a student eligible for special education under the category of learning disabled.
- 3. The MDAT data for another student does not support the disability category of emotionally disturbed. Behavior indicators do not indicate clinically significant issues. The existing data would support a possible learning disability.
- 4. An MDAT report for another student states they are eligible as a student with multiple disabilities (mental retardation-510 and speech/language-550), however, the student was dismissed from speech services at the MDAT meeting. A district evaluation list provided to the monitoring teams indicates this student was placed on the 2003 child count as a student with autism (560). Social and behavior evaluation data was not available to support this as disability category.
- 5. Evaluation data for four students, categorized as students with other health impairments, did not identify how the disability impacts education or the need for an individual education program. Behavior scores contained no clinically significant indicators and/or the students programs contained no educational services.

Specific information regarding each of these students has been provided to the Director of Special Services. Each student's IEP team must meet and resolve the issues identified.

24:05:25:04. Evaluation procedures.

The school district shall ensure a variety of assessment tools and strategies are used to gather relevant functional and development information about the child, including information provided by the parents that may assist in determining whether the child is a child with a disability and content of the child's IEP.

24:05:27:01.03. Content of individualized education program.

A student's IEP must contain present levels of performance based upon the specific skill areas affected by the student's disability. The present levels of performance are based upon the functional assessment information gathered during the comprehensive evaluation process. Present levels of performance must contain the student's strength, needs, effect of the disability on the student's involvement/progress in the general curriculum and parent input.

Through interview and a review of 51 student records, the monitoring team found the district staff did not consistently include functional information in the evaluation process by gathering, analyzing and developing a written summary of strength and needs for each skill areas affected by the student's disability, including transition. The student's present levels of academic performance, development of annual goals and short term instructional objectives therefore did not link to evaluation. Functional assessment information is available through a variety of sources in the district; however, there is not an established process across all grade levels and disciplines for collecting, analyzing, summarizing or

integrating the information into the multidisciplinary assessment team report (MDAT) for all eligible students.

24:05:25:04. Evaluation procedures.

The school districts shall ensure the child is assessed in all areas related to the suspected disability, including, as applicable, health, vision, hearing, social and emotional status, general intelligence, academic performance, communicative status, and motor abilities.

24:05:25:04.03. Determination of eligibility.

Upon completing the administration of tests and other evaluation materials, the individual education program team shall determine whether the student is a student with a disability. The school district shall provide a copy of the evaluation report and the documentation of determination of eligibility to the parent.

The monitoring team noted approximately 32 files that contained a variety of evaluation issues. For example, the evaluation report (MDAT) of a visually impaired student did not include achievement information for the determination of eligibility. The program of a student with learning disabilities contained goals for written expression however, written expression was never evaluated. The evaluation data for a student identified as other health impaired (OHI), supported a disability category of learning disabled and not OHI. Transition evaluations were not administered for several students of transition age. Behavior concerns were documented in MDAT reports and IEPs with no evidence of evaluation or intent to evaluate. Areas of evaluation listed on the prior notice/consent were not administered and tests were also administered when prior notice/consent was not acquired.

Principle 4 – Procedural Safeguards

Parents of children with disabilities have certain rights available. The school makes parents aware of these rights and makes sure they are understood. The specific areas addressed in principle four are adult student/transfer of rights, content of rights, consent, written notice, confidentiality and access to records, independent educational evaluation (IEE), complaint procedures, and due process hearings.

Steering Committee Self-Assessment Summary

Data sources used:

- Teacher file reviews
- Parent surveys
- Comprehensive plan
- Parental rights document
- Consent and prior notice forms
- Public awareness information
- Family Education Right and Privacy Act
- Access logs
- IEP
- Process and procedure manual
- Surrogate parent letter/packet

Promising practice

The steering committee concluded the special services caseworkers are a vital link between the district and families of children with disabilities.

Meets requirements

The steering committee concluded the district ensures the rights of a child are protected if no parent can be identified. Parents receive a copy of their right and are informed of issues requiring their consent. The district has had one complaint and one due process hearing within the last three years and followed all required procedures in each situation.

Validation Results

Promising practice

Through interview and observation, the monitoring team agrees with all areas identified as promising practices for procedural safeguards as concluded by the steering committee.

Two case workers are hired to work as a liaison between the parents and the schools. They work to create a bridge so services can be provided to the students while ensuring the parents are included in the special education process. They complete social histories as part of the evaluation process and help parents with behavior checklists. They meet with parents/families to help provide community resources in areas such as medical, counseling and financial assistance. The case workers also help parents complete SSI forms, residential facility placement forms, etc. The case workers also have access to many community resources, and are familiar with various community programs such as child protection and community health meetings. They also are part of the special services advisory council.

Meets requirements

Through interview and observation the monitoring team agrees with all areas identified as meeting requirements as concluded by the steering committee.

Principle 5 – Individualized Education Program

The Individualized Education Program (IEP) is a written document for a child with a disability that is developed, reviewed and revised by the IEP team, which includes the parent. The specific areas addressed in principle five are IEP team, IEP content, transition components for secondary IEPs, annual reviews, transition from early intervention program, and IEP related issues.

Steering Committee Self-Assessment Summary

Data sources used:

- Student file reviews
- Student surveys
- Parent surveys
- RCAS staff surveys
- State data
- CIMP advisory panel

Promising practice

The steering committee concluded the technology specialist employed by the district is a promising practice.

Meets requirements

The steering committee concluded the Rapid City School District meets the requirements in the area of providing written notice for IEP team meetings and team membership.

Needs improvement

The steering committee concluded the district does not have data relating to the completion of transition evaluation and that present levels of performance are not consistently linked to functional evaluation.

Out of compliance

The steering committee concluded student centered life planning outcomes for employment and living were not consistently documented for students turning 14 years old. Data relating to "statement of transition services/activities" was not documented, or documented incorrectly, in most of the files reviewed by the district. Transition planning is not an outcome-oriented process that links the student's life planning outcomes, present levels of performance and goals/services needed by the student.

Validation Results

Promising practice

Through interview and observation, the monitoring team agrees with the area identified as promising practices for individual education program as concluded by the steering committee.

The technology specialist goes into classrooms to evaluate a students technology needs. She acts as a resource to the building teams regarding the incorporation of assistive technology into the student's education. The specialist also works with teachers to ensure they know how to use the assistive technology with the student in their classroom.

Meets requirements

Through interview and observation, the monitoring team agrees with all areas identified as meeting requirements for individual education program as concluded by the steering committee.

Needs improvement

Through interview and a review of student records, the monitoring team could not validate transition assessment and present levels of performance as areas in need of improvement. Additional information is located under Principle 3, evaluation procedures.

Out of compliance

24:05:27:13.02. Transition services

Transition services are a coordinated set of activities for a student, designed within an outcome-oriented process.

24:05:27:01.03. Content of individualized education program

For each student beginning at age 16 or younger, the IEP is to include a statement of the needed transition services, including interagency responsibilities. Beginning at least one year before a student reaches the age of majority under state law, the student's individualized education program must include a statement that the student has been informed of his or her rights under Part B of the Individuals with Disabilities Education Act, if any, that will transfer to the student on reaching the age of majority.

The course of study for each student is a compilation of the required courses to graduate from high school. Based on the student's interests and individual evaluation, specific courses that are linked to the student's life planning outcomes should be discussed by the IEP team and incorporated into the IEP. Through an analysis of the individual transition evaluation, the IEP team develops present levels of performance, transition services and activities which link to the student's life planning outcomes.

Through a review of student records and interviews with district staff, the monitoring team found the district lacks a system to ensure a consistent transition planning process for students with disabilities. Inconsistencies which were found included the lack of transition evaluation for several students and life planning outcomes not developed or specific to the students interests for nine students. The present levels of performance for transition were not developed or contained very little information. The course of

study was not developed for six students by age 14 and did not link to the life planning outcomes. Transition services and activities were not addressed for six students by age 16. The transfer of rights was not completed one year prior to age18 for two students. The specific graduation requirements were not addressed in the IEPs of 11 students. The district showed evidence of all components required in the transition planning process for students, however, they did not link to present levels of performance and evaluation and were not consistently reflected in the IEP process.

Principle 6 – Least Restrictive Environment

After the IEP is developed or reviewed, the IEP team must decide where the IEP services are to be provided. Consideration begins in the general education classroom for school age students. The specific areas addressed in principle six are placement decisions, consent for initial placement, least restrictive environment procedures, preschool children, and LRE related issues.

Steering Committee Self-Assessment Summary

Data sources used:

- Tables F, G, I, J and "Where Are Our Student's" table
- Student file reviews
- Preschool information
- Parent surveys
- Student surveys
- General educator surveys

Promising practice

The steering committee concluded early intervention services are currently being provided in five elementary schools as part of the districts integrated preschool program. The district collaborates with Youth and Family Services Head Start and Dakota Transitional Headstart to review referrals, complete evaluations and meetings with parents. The district has developed an integrated developmentally appropriate preschool curriculum implemented in all preschools settings.

The district has an Autism Spectrum Disorder Programming Team (ASD) which provides technical assistance and training to staff in the Rapid City Area School District who has students that are suspected of having autism, Aspergers and other disorders within the autism spectrum.

RCAS currently uses an in-depth and comprehensive PAT (Placement Assistance Team) process prior to consideration of placing students in more restrictive placements (i.e. District Wide MH Programs or District Wide ED Programs).

Meets requirements

The steering committee concluded the only reason a student would not be enrolled in a school that is not in his/her attendance area would be for parent choice, district-wide placement, and/or suspension classroom. The district also has preschools within five elementary schools.

Validation Results

Promising practice

Through interview and observation, the monitoring team agrees with all areas identified as promising practices for least restrictive environment as concluded by the steering committee.

There are 5 community pre-schools within elementary buildings in the district. One benefit is the inclusion of students with disabilities with their non-disabled peers in a learning environment. The ratio is usually 50/50. The preschool services are provided to students with disabilities at no cost to the parents. There is a waiting list for the tutition students who want to attend. Three year olds come three mornings a week, while the four year olds attend four afternoons a week.

There is one special education teacher and two special education assistants for each classroom. Wednesday afternoon is set aside for pre-referral home visits. These are conducted on an as needed basis. Speech, occupational therapy and physical therapy work with the students in the classroom with occasional pull-out. The speech therapist works with the students during group circle time. The students also receive adapted physical education in which everyone participates.

Personnel have developed a district-wide pre-school curriculum that links to the content standards. The content areas, indicators and strategies outlined in this curriculum are based on 50 functional curriculum standards and provide a basis for our students to develop academic and life skills. The pre-schools have become an integral part of the elementary school building. The pre-school special education teacher is involved in building level teams. The building principal participates in transition meetings. A major benefit noted by staff is that students with disabilities are more prepared to attend school. They understand rules, learn how to follow directions and listen, get time with non-disabled peers and are better prepared for kindergarten.

Youth and Family Services Head Start collaborate with the district to provide training opportunities for parents. District staff and Head Start staff are included in all activities that take place on site. Pre-referral meetings are held onsite in the Headstart program.

The ASD team assists special and general educators across the district in programming for students that are suspected of having autism, Aspergers and other disorders within the autism spectrum. This allows the students to be successfully served in their current placement. The team members include special services program director, a psychologist, a program specialist, the child find coordinator, and occupational therapist and two speech therapists. The ASD team works with diagnosed student teams as in-district consultation. The team also provides training for staff, develop materials for students/teachers, and conduct home visits to help parents structure the home setting.

The placement assistance PAT process is designed as a "gate keeper" for a least restrictive environment. The behavior strategists are a major part of the PAT process. Before there is a referral for a student to leave the building, the referral must go through the placement assistance team. The team works to exhaust all resources before a child is removed from their home school building.

Of the total special education population of 1,673 students, only five students required out-of-district placement in 2002. This indicates the district is providing a wide range of service options.

Meets requirements

Through interview and observation, the monitoring team agrees with all areas identified as meeting requirements for least restrictive environment as concluded by the steering committee.